



### Submission

Submitter:	Deirdre Carroll
Submission Title:	Submission
Submission Reference No.:	S005909
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### Application

Applicant:	Saint-Gobain Construction Products (Ireland) Limited
Reg. No.:	P0519-04

See below for Submission details.

Attachments are displayed on the following page(s).

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Date: 20<sup>th</sup> November 19

Ref. P0519-04

To whom it may concern:

Having reviewed the application on line and having to live with the aftermath of ongoing poor practice by Saint-Gobain I would like to make an official objection to this application.

I would like it noted that the Facility information summary is not very clear for public review.

As an example, the box appears to cut off mid-sentence where we should be able to see content as highlighted in yellow below.

Facility Information Summary	
AER Reporting Year	2018
Licence Register Number	P0519-03
Name of site	Saint Gobain Construction Products (Ireland) Ltd.
Site Location	Kingscourt Co. Cavan
NACE Code	211
Class/Classes of Activity	1.3
National Grid Reference (6E, 6 N)	Mine Site : 281000E, 299500N Process Site : 278800E, 292200N

A description of the activities/processes at the site for the reporting year. This should include information such as production increases or decreases on site, any infrastructural changes, environmental performance which was measured during the reporting year **and an overview of compliance with your licence listing all exceedences of licence limits (where applicable) and what they relate to e.g. air, water, noise.**

Class 1.3 The extraction and processing (including size reduction, grading and heating) of mineral within the meaning of the minerals development acts 1940 to 1999, where an activity involves any other operation where either the level of extracted or processed mineral is greater than 200,000 tonnes per annum or the total operation yield is greater than 1,000,000 tonnes and storage of related mineral waste. At Saint Gobain Mining (Ireland) Ltd., gypsum is mined underground and transported approx. 8Km by road to Saint Gobain Construction Products Ireland Ltd. where it is used to manufacture plaster and plaster boards for the construction industry. Both activities are licenced under IED licence P0519-03. Gypsum is a non metallic mineral, which is found in rock form. It is composed of Calcium Sulphate di-hydrate. After mining Gypsum is crushed and transported by road to the processing facility where it is calcined and then converted to gypsum plaster boards or builders plaster. Production is beginning to increase following the downturn in recent years. A new rock storage facility has been constructed on site in 2012. **This reduces the amount of dust on site and**

The following results are concerning given that the survey was abandoned due to deformed pipes and although I hope this is a typo on the company's behalf as it would appear Saint-Gobain have no plans to complete a review or corrective action until Sep. 21?

MH16-P56	Foul	PVC	No	None	Camera Inspection	Yes	Test not completed	Initial test failed could not be completed as survey abandoned due to deformed pipe	None	Sep-21
T0445- P54	Foul	PVC	No	None	Camera Inspection	No	Test not completed	Hard angle in pipe prevented camera test	None	Sep-21

Given the subsidence issues and subsequent environmental impacts in the area since this incident I feel it would be prudent for soil analysis to be completed prior to issue of licence to determine if

there are any issues developing. I acknowledge the licence asks for a frequency of every 10 years and that the document alludes to soil analysis scheduled for 2019. Is this information available or can it be made available?

This photo shows contamination evident in the River Lagan September 2019. This information was shared directly with Saint-Gobain representative.



A repeat of this contamination is occurring today 20<sup>th</sup> December 2019.



This contamination suggests yet another incident due to poor work practices continuing in Saint-Gobain Magheracloone and is clearly damaging the environment. I would challenge the accuracy of point 12 in the table below based on the evidence in photo included and the repeat incidents occurring in the River Lagan.

Groundwater/Soil monitoring template		Lic No:	P0519-03	Year	2018
		Comments			
1	Are you required to carry out groundwater monitoring as part of your licence requirements?	yes	Every 10 years. Not yet performed. New IED licence issued in 2015. Soil analysis scheduled for 2019.	Please provide an interpretation of groundwater monitoring data in the interpretation box below or if you require additional space please include a groundwater/contaminated land monitoring results interpretation as an additional section in this AER	
2	Are you required to carry out soil monitoring as part of your licence requirements?	yes			
3	Do you extract groundwater for use on site? If yes please specify use in comment section	no			
4	Do monitoring results show that groundwater generic assessment criteria such as GTVs or IGVs are exceeded or is there an upward trend in results for a substance? If yes, please complete the Groundwater Monitoring Guideline Template Report (link in cell G8) and submit separately through ALDER as a licensee return AND answer questions 5-12 below.	no		<p>Mine and Process site wells show no consistent upward trend in parametric values over the last 5 years. Parametric values are generally stable. As expected, there is some level of variability noted in all wells with occasional breaches of EPA IGV values. A full groundwater monitoring report is available upon request from Saint Gobain Construction Products (Ireland) Ltd.</p>	
5	Is the contamination related to operations at the facility (either current and/or historic)	SELECT			
6	Have actions been taken to address contamination issues? If yes please summarise remediation strategies proposed/undertaken for the site	SELECT			
7	Please specify the proposed time frame for the remediation strategy	SELECT			
8	Is there a licence condition to carry out/update ELRA for the site?	yes			
9	Has any type of risk assessment been carried out for the site?	yes			
10	Has a Conceptual Site Model been developed for the site?	yes			
11	Have potential receptors been identified on and off site?	yes			
12	Is there evidence that contamination is migrating offsite?	no			

We have been informed by company reps that the subsidence occurred due to the redirection of water from the existing mine. One can only assume that this was to comply with licencing agreements which meant excessive volumes of water during a given time period could not be redirected into the River Bursk. Clearly the company failed to complete a detailed risk assessment prior to putting this plan into place resulting in the catastrophe that followed for the local community i.e. subsidence issue. The application to increase emissions is highly concerning as they clearly can't cope with the current volumes of water. Where are they planning to put the excessive water now never mind seeking an increase in volumes under future planning?

Indeed, what is happening underground currently with the all the water volume that they have redirected prior to this date into the redundant mine? The subsidence piece is only one part of the problem. Surely this will have an impact down the line on the local water tables with continued erosion underground feeding increased contamination into the water table. This is very concerning and needs public investigation as it is not evident above the ground. Local wells for human consumption need to be considered further e.g. 5, 10, 15 years down the line. Focus needs to be on what's going on in the aftermath post subsidence underground and the potential environmental impact it will have in our community down the line.

Results appear to vary on Groundwater/Soil monitoring template Lic No:P0519-03Year2018.

pH ranges fluctuating from lows of 6.8 to highs of 12.42 in Dec. 18 suggest fluctuations in some environmental factor. Where is the supporting evidence to alleviate concerns on local environmental impacts from this variation?

I would also question how the information on complaints for 2018 is accurate given the number of locals that raised complaints post subsidence in 2018. Is it a case that due to the massive volumes of complaints raised that Saint-Gobain choose not to capture data under the environmental umbrella or is it simply a case that public concern voiced for local environment was not considered?

Key concerns I have with the application is the potential long-term environmental impacts this mining activity continues to have in our community. Without scientific evidence it is hard to see the potential negative impacts this company's activities have had to date aside from the obvious subsidence issues and the repeat contaminations occurring in the local river. The image of the River Lagan above needs no scientific supporting evidence to show poor practice continues and has already impacted on the local environment and further downstream.

Where I live, I can confirm that the noise generated by blasting in the mine impacts on us all, our pets and properties due to loud blasts from the mines. Rather than a tick box exercise of measurements taken as detailed in Table N1 it would be good to understand the EPA's/Saint-Gobain's understanding of the Tonal/Impulsive noises generated by this site activity. How is this activity captured under licence?

Airborne contamination from dust generation and indeed methods used for this analysis seem dated e.g. Dust jars. Is this best in class available to an International company? One only needs to drive by Saint-Gobain entrances to notice the wilted condition of the trees in the area e.g. Navan road/Eanagh. Is this considered as part of the company's Environmental Aspects register? Quite clearly the airborne contamination from this operation is having a significant impact on the vegetation in this area.

What consideration if any has been given to the natural wildlife in this area, and natural environment in the area?

My children have the right to grow up in an environment where their health and well being is not jeopardised by the activities of a local company.

I'm happy to discuss content above should you wish to call me on number below.

Kind regards

Deirdre Carroll



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